

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
JOANN INC., <i>et al.</i> ,	Case No. 25-10068 (CTG)
Debtors. ¹	(Jointly Administered)

**NOTICE OF MYRTLE BEACH FARMS COMPANY, INC.’S INTENT TO
OFFER WITNESS TESTIMONY AT THE HEARING SCHEDULED FOR
JUNE 23, 2025, AT 2:00 P.M. (ET)**

Undersigned counsel for Myrtle Beach Farms Company, Inc. (“Myrtle Beach Farms”) hereby submits this notice of intent to offer witness testimony and exhibits (the “Notice”) in connection with the hearing on June 23, 2025, at 2:00 P.M. (prevailing Eastern Time) in the above-captioned case.

THE WITNESS

Myrtle Beach Farms intends to call Carter Garrison, corporate representative for Myrtle Beach Farms, in connection with the Amended First Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases (D.I. 930) [the “Notice”]. Detailed information concerning the witness and any associated exhibits to be presented at the hearing are attached hereto as Exhibit A.

Myrtle Beach Farms reserves the right to further amend or supplement this witness list at or prior to the hearing, to call any witness designated by any other party, and to introduce into evidence any documents or exhibits designated by any other party.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

WHEREFORE, should this Honorable Court have any questions or concerns regarding this Notice, counsel is available at the earliest convenience of the Court to address them.

Date: June 18, 2025

Respectfully submitted,

By: Michael Busenkell
Michael Busenkell, Esq. (DE 3933)
**GELLERT SEITZ BUSENKELL &
BROWN, LLC**
1201 North Orange Street, Suite 300
Wilmington, DE 19801
Phone: (302) 425-5800
mbusenkel@gsbblaw.com

*Counsel for Myrtle Beach Farms Company,
Inc.*

EXHIBIT A

NAME	POSITION
Carter Garrison	SVP, Commercial Division. Burroughs & Chapin
Presentation of direct Testimony	Live courtroom testimony.
Document Exhibits with the witness during testimony	<ol style="list-style-type: none"> 1. Lease Agreement, as amended, dated as of January 28, 2022 between Myrtle Beach Farms Company, Inc. and Jo-Ann Stores, LLC for the property located at 1120 Seaboard St., Myrtle Beach, South Carolina 2. Lease Agreement, as amended, dated April 11, 2006 between Ross Dress for Less, Inc. and Myrtle Beach Farms Company, Inc. for the property located at 1120 Seaboard St., Myrtle Beach, South Carolina 3. Letter from Rita Hutchings, Sr. Director Lease Administration, Ross Dress for Less, Inc. dated May 25, 2025 4. Lease Agreement, as amended, dated December 3, 2009 between Dollar Tree Stores, Inc. and Myrtle Beach Farms, Inc. for the property located at 1120 Seaboard St., Myrtle Beach, South Carolina 5. Lease Agreement, as amended, dated April 15, 1991 between

	<p>OfficeMax, Inc. and Myrtle Beach Farms, Inc., for the property located at 1120 Seaboard St., Myrtle Beach, South Carolina</p> <p>6. Lease Agreement, as amended, dated April 5, 2006 between CostPlus, Inc. and Myrtle Beach Farms, Inc. for the property located at 1120 Seaboard St., Myrtle Beach, South Carolina</p> <p>7. Lease Agreement, as amended, dated August 27, 1993 between Lowe's Home Centers Inc. and Myrtle Beach Farms, Inc., and amendments, for the property located at 1120 Seaboard St., Myrtle Beach, South Carolina</p> <p>8. Lease Agreement, as amended, dated December 23, 2019 between Haverty Furniture Company Inc. and Myrtle Beach Farms, Inc., and amendments, for the property located at 1120 Seaboard St., Myrtle Beach, South Carolina</p> <p>9. Lease plan for Seaboard Commons</p> <p>10. Operations and Easement Agreement dated August 8, 1994</p> <p>11. Burlington Stores, Inc. 10-K for the period ended February 1, 2025</p> <p>12. Burlington Stores, Inc. 10-Q for the period ended November 2, 2024</p>
Parties who may seek to cross examine the witness	<p>1. Joann Inc., <i>et al.</i></p> <p>2. Burlington Coat Factory Warehouse Corporation</p>